

EXHIBIT R

Archived: Wednesday, January 12, 2022 5:20:13 PM

From: Omar Mohammedi, Esq.

Sent: Wed, 2 Jun 2021 22:20:43

To: rhaefe@motleyrice.com FGoetz@goetzeckland.com

Cc: jflowers@motleyrice.com jeubanks@motleyrice.com SCarter1@cozen.com starbutton@cozen.com
JKreindler@kreindler.com amaloney@kreindler.com Jgoldman@andersonkill.com Bstrong@andersonkill.com
jhaileselassie@motleyrice.com rheyl@motleyrice.com dkappler@motleyrice.com rcashon@motleyrice.com

Subject: EXTERNAL-RE: 20210504 L PECs to O Mohammedi and F Goetz (re Blankinship)

Importance: Normal

Sensitivity: None

Dear Robert,

As is clear from our December 2020 correspondence, Professor Blankinship mistakenly cited to materials he relied on by reference to their location in an index, rather than to the document which he reviewed and considered in his report. We provided the index to Blankinship to use it as guide to locate and review the documents. In our December 2020 correspondence Mr. Blankinship corrects the mistaken citations by referring plaintiffs to the Bates stamped documents upon which Professor Blankinship relied. Specifically, on page 38 of his report, Professor Blankinship relied on FED-PEC0099263-296 but referred to the document as cell 1627. At footnote 32, he relied on FED-PEC0249922-384 but referred to that document as Cell 770. At footnote 113, he relied on WAMYSA 057780 but referred to that document as Cell 321.

Professor Blankinship did not rely upon the index in forming his opinion. He merely used it to navigate the discovery production. The index is attorney work product that is protected from disclosure. Your request for its production violates the parties' agreement not to inquire into the substance of attorney-experts communications. Your request raises concerns and runs the risk of opening demands for attorney-expert communications, including communications between plaintiffs and their experts.

Thank you for your attention.

From: Haeefe, Robert <rhaefe@motleyrice.com>

Sent: Tuesday, June 1, 2021 6:00 PM

To: Omar Mohammedi, Esq. <OMohammedi@otmlaw.com>; Frederick Goetz <FGoetz@goetzeckland.com>

Cc: Flowers, Jodi <jflowers@motleyrice.com>; Eubanks, John <jeubanks@motleyrice.com>; Carter, Sean <SCarter1@cozen.com>; Tarbutton, Scott <starbutton@cozen.com>; Kreindler, Jim <JKreindler@kreindler.com>; Andrew J. Maloney <amaloney@kreindler.com>; Goldman, Jerry S. <Jgoldman@andersonkill.com>; Strong, Bruce <Bstrong@andersonkill.com>; Haileselassie, Jade <jhaileselassie@motleyrice.com>; Heyl, C. Ross <rheyl@motleyrice.com>; Kappler, David <dkappler@motleyrice.com>; Cashon, Richard <rcashon@motleyrice.com>

Subject: RE: EXTERNAL-RE: 20210504 L PECs to O Mohammedi and F Goetz (re Blankinship)

Dear Omar,

I am concerned that the response that you provided on May 6 did not address the request that we made for data considered by your expert but that has not yet been provided. Specifically, multiple citations in Khalid Blankinship's report cite a reliance document as "2020-02-20 Topics Index for Experts." See, e.g., footnotes 32 and 113 and in the text on Page 38. Given the multiple citations to the document, it is clear that Blankinship considered the document and relied on at least portions of it. In the index that you provided with your May 6 email, you have merely referenced another document to which the Topics Index for Experts appears to have referred. To be clear, we are asking that you produce the full considered/reliance

document, not the source cited within the considered/reliance document.

Regards,

Robert Haefele | Attorney at Law | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464
o. 843.216.9184 | f. 843.216.9450 | rhaefele@motleyrice.com

From: Omar Mohammedi, Esq. <OMohammedi@otmlaw.com>
Sent: Thursday, May 6, 2021 3:35 PM
To: Haefele, Robert <rhaefele@motleyrice.com>; Frederick Goetz <FGoetz@goetzeckland.com>
Cc: Flowers, Jodi <jflowers@motleyrice.com>; Eubanks, John <jeubanks@motleyrice.com>; Carter, Sean <SCarter1@cozen.com>; Tarbutton, Scott <starbutton@cozen.com>; Kreindler, Jim <JKreindler@kreindler.com>; Andrew J. Maloney <amaloney@kreindler.com>; Goldman, Jerry S. <Jgoldman@andersonkill.com>; Strong, Bruce <Bstrong@andersonkill.com>; Haileselassie, Jade <jhaileselassie@motleyrice.com>; Heyl, C. Ross <rhey1@motleyrice.com>; Kappler, David <dkappler@motleyrice.com>; Cashon, Richard <rcashon@motleyrice.com>
Subject: EXTERNAL-RE: 20210504 L PECs to O Mohammedi and F Goetz

Sorry, the letter was dated December 10, 2020. Thanks.

From: Omar Mohammedi, Esq.
Sent: Thursday, May 6, 2021 3:33 PM
To: 'Haefele, Robert' <rhaefele@motleyrice.com>; Frederick Goetz <FGoetz@goetzeckland.com>
Cc: Flowers, Jodi <jflowers@motleyrice.com>; Eubanks, John <jeubanks@motleyrice.com>; Carter, Sean <SCarter1@cozen.com>; Tarbutton, Scott <starbutton@cozen.com>; Kreindler, Jim <JKreindler@kreindler.com>; Andrew J. Maloney <amaloney@kreindler.com>; Goldman, Jerry S. <Jgoldman@andersonkill.com>; Strong, Bruce <Bstrong@andersonkill.com>; Haileselassie, Jade <jhaileselassie@motleyrice.com>; Heyl, C. Ross <rhey1@motleyrice.com>; Kappler, David <dkappler@motleyrice.com>; Cashon, Richard <rcashon@motleyrice.com>
Subject: RE: 20210504 L PECs to O Mohammedi and F Goetz

Dear Robert:

I am attaching the letter and the appendix we sent on December 20, 2020. The appendix identifies the documents you are requesting. Thank you.

Best Regards,

From: Haefele, Robert <rhaefele@motleyrice.com>
Sent: Tuesday, May 4, 2021 6:34 PM
To: Omar Mohammedi, Esq. <OMohammedi@otmlaw.com>; Frederick Goetz <FGoetz@goetzeckland.com>
Cc: Flowers, Jodi <jflowers@motleyrice.com>; Eubanks, John <jeubanks@motleyrice.com>; Carter, Sean <SCarter1@cozen.com>; Tarbutton, Scott <starbutton@cozen.com>; Kreindler, Jim <JKreindler@kreindler.com>; Andrew J. Maloney <amaloney@kreindler.com>; Goldman, Jerry S. <Jgoldman@andersonkill.com>; Strong, Bruce <Bstrong@andersonkill.com>; Haileselassie, Jade <jhaileselassie@motleyrice.com>; Heyl, C. Ross <rhey1@motleyrice.com>; Kappler, David <dkappler@motleyrice.com>; Cashon, Richard <rcashon@motleyrice.com>
Subject: 20210504 L PECs to O Mohammedi and F Goetz

Dear Fred and Omar,

Please see attached correspondence regarding missing reliance documents regarding the report from Khalid Blankinship

Regards,

Robert Haefele | Attorney at Law | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464
o. 843.216.9184 | f. 843.216.9450 | rhaefele@motleyrice.com

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Omar Mohammedi, Esq.

Adjunct Professor, Fordham Law School

Law Firm of Omar T. Mohammedi, LLC
233 Broadway, Suite 820
New York, NY 10279
Phone: 212.725.3846 Ext. 101
Facsimile: 212.202.7621
www.otmlaw.com
[Follow us on Twitter @OTMLAW](https://twitter.com/OTMLAW)



Omar Mohammedi, Esq.

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Law Firm of Omar T. Mohammedi, LLC
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New York, NY 10279
Phone: 212.725.3846 Ext. 101
Facsimile: 212.202.7621
www.otmlaw.com
[Follow us on Twitter @OTMLAW](https://twitter.com/OTMLAW)



THE LAW FIRM OF OMAR T. MOHAMMED, LLC
ATTORNEYS AT LAW NEW YORK, NY

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